

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

	)	CHAPTER 13
IN RE	)	
	)	CASE NO.: 24-10410-AMC
MENUHAH KEEL,	)	
Debtor	)	
~~~~~	)	
ALLY CAPITAL,	)	
Movant	)	
vs.	)	<b>HEARING DATE:</b>
	)	Tuesday, February 18, 2025
MENUHAH KEEL, and	)	11:00 A.M.
AARON KEEL, Codebtor.	)	
Respondent(s)	)	
and	)	
KENNETH E. WEST	)	<b>LOCATION:</b>
Trustee	)	900 Market Street, Suite 400
	)	Courtroom No. 4
	)	Philadelphia, PA 19107

**MOTION FOR RELIEF FROM AUTOMATIC STAY AND CODEBTOR STAY**

AND NOW, comes the above-captioned Movant, Ally Capital, by and through their attorney, Regina Cohen, who files this Motion based upon the following:

1. The Movant is a corporation having a principal place of business located at 1234 Main, Desoto, TX 75115.
  
2. The Respondent, Menuhah Keel is an individual with a mailing address at 5234 N 10th St, Philadelphia, PA 19141, who has filed a Petition on February 07, 2024 under Chapter 13 of the Bankruptcy Code.
  
3. On or about October 16, 2021, Debtor Menuhah Keel and Co-debtor AARON KEEL entered into a , involving a loan in the amount of \$51,526.96 for the purchase of a 2019 Nissan Armada Utility 4D SL AWD 5.6L V8.
  
4. The vehicle secured by the Contract has V.I.N. JN8AY2NC7K9585366.
  
5. Movant is the assignee of the Contract.

6. The above – described vehicle is encumbered by a lien with a payoff in the amount of \$42,340.84 plus other appropriate charges as of January 27, 2025 but subject to change. The regular monthly payment is \$860.00 at an interest rate of 7.29%.

7. Applying payments received to the earliest payment due, payments have been missed post-petition, since February 29, 2024 in the amount of \$8,718.74, plus all applicable interest, attorneys' fees and costs.

8. The Property has a N.A.D.A. Value of \$23,125.00.

9. The vehicle is not necessary to an effective reorganization.

10. The Movant is the only lienholder of record with regard to the vehicle.

11. Failure to make adequate protection payments is cause for relief from the automatic stay and codebtor stay.

12. The Movant has incurred attorney's fees in the filing of this Motion.

13. The vehicle is a rapidly depreciating asset. Movant requests the waiver of Rule 4001(a)(3).

WHEREFORE, Movant prays for your Honorable Court to enter an Order permitting the Movant to proceed with the repossession proceedings of the aforementioned vehicle.

Respectfully submitted,  
Lavin, Cedrone, Graver, Boyd & DiSipio

/s/ Regina Cohen  
Regina Cohen  
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